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Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

SONOS, INC.,
Plaintiff and Counter-defendant,
v.
GOOGLE LLC,
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT
ROBERTS IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL RE SONOS'S
MOTION *IN LIMINE* NO. 2**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good
5 standing of the Bar of the State of California. I make this declaration based on my personal
6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under
9 Seal in connection with Sonos’s Motion *in Limine* No. 2 (“Sonos’s Motion”) and Google’s
10 Response to Motion *in Limine* No. 2 (“Google’s Response”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Exhibit B to Kolker Declaration	Portions highlighted in blue	Sonos
Exhibit E to Kolker Declaration	Portions highlighted in blue	Sonos
Google’s Response	Portions highlighted in blue	Sonos
Exhibit 1 to Williams Declaration	Portions highlighted in yellow	Sonos

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18 4. The highlighted portions of the above exhibits and Google’s response contain
19 references to Sonos’s confidential business information and trade secrets, including technical
20 details of the operation of Sonos’s technology, such as source code and Sonos’s research and
21 development processes. The specifics of how this technology operates is confidential information
22 that Sonos does not share publicly. Thus, public disclosure of such information may lead to
23 competitive harm as Sonos’s competitors could use these details regarding the architecture and
24 functionality of these products to gain a competitive advantage in the marketplace with respect to
25 their competing products. A less restrictive alternative than sealing the portions of the Sonos’s
26 Motion and the exhibits indicated in the table above would not be sufficient because the
27 information sought to be sealed is Sonos’s confidential business information and trade secrets and
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1 is integral to Sonos's legal arguments (in the case of Exhibits B and E to the Kolker Declaration)
2 or cited by Google (in the case of Google's Response and Exhibit 1 to the Williams Declaration).

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4 I declare under penalty of perjury that the foregoing is true and correct to the best of my
5 knowledge. Executed this 25th day of April, 2023 in Belvedere, California.

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7 /s/ Clement S. Roberts

8 Clement Seth Roberts
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